Case 5:07-cv-05158-JF

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FOLEY & LARDNER LLP Also admitted in Arizona RECEIVED

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March 3, 2006

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Larry Arnold Foley & Lardner One Maritime Plaza, Sixth Floor San Francisco, CA 94111-3404

Re:

SEIU, Local 715

Stanford Hospital & Clinics

Carol Harry - Grievance No. 2005-244

Dear Mr. Arnold:

I understand the facts to be as follows: The employer Step II grievance decision is dated November 11, 2005 from Laurie Kuintel. The Union received that letter on November 23, 2005, and faxed its letter to arbitrate on December 5, 2005, well within the fourteen (14) calendar day requirement. Stanford's letter was not sent certified mail.

I understand this same issue was previously litigated, and the arbitrability claim was rejected.

If the facts are as I described, and the employer insists on bifurcation, the Union will request that the employer pay the Arbitrator's fees for this unnecessary hearing. In the alternative, we request that the matter not be bifurcated.

W. Daniel Boone

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K.C. Snodgrass cc:

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